

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

ROOT, INC., <i>et al.</i> ,	:	Case No. 2:23-cv-00512-SDM-CMV
	:	
Plaintiffs,	:	Judge Sarah D. Morrison
	:	Magistrate Judge Chelsey M. Vascura
v.	:	
	:	
BRINSON CALEB SILVER, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	

**AGREED MOTION FOR EXTENSION OF TIME TO OPPOSE  
MOTION TO DISMISS (ECF NO. 94)**

Plaintiffs, Root, Inc., Caret Holdings, Inc. and Root Insurance Agency, LLC (collectively “Root”), respectfully move this Court for an additional seven (7) day extension of time to file an opposition to the Motion to Dismiss (ECF No. 94) filed by Specially Appearing Defendants William Campbell and Quantasy & Associates, LLC (collectively, the “Quantasy Defendants”). Root’s opposition is currently due June 15, 2023. The requested extension would move the due date to June 22, 2023. One prior fourteen (14) day extension was granted to Root (See ECF Nos. 106 and 107). This request is not for the purposes of delay; Root simply needs more time to fully brief the issues raised in the Quantasy Defendants’ fifty-four (54) page Motion. Counsel for Root and Counsel for the Quantasy Defendants have conferred regarding this Motion, and the Quantasy Defendants do not object and agree to the requested extension of time.

Accordingly, Root and the Quantasy Defendants move for an extension until June 22, 2023 to file a response to the Quantasy Defendant’s Motion to Dismiss.

Respectfully submitted,

/s/ William D. Kloss, Jr.

William D. Kloss, Jr. (0040854), Trial Attorney  
Elizabeth S. Alexander (0096401)  
Grace E. Saalman (0101603)  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street, P.O. Box 1008  
Columbus, Ohio 43216-1008  
Telephone: 614.464.6360  
Facsimile: 614.719.4807  
wdklossjr@vorys.com  
esalexander@vorys.com  
gesaalman@vorys.com

Matthew L. Kutcher  
(Admitted *Pro Hac Vice*)  
Cooley LLP  
110 N. Wacker Drive, Suite 4200  
Chicago, IL 60606  
Telephone: 312.881.6500  
Facsimile: 312.881.6598  
mkutcher@cooley.com

Kristine A. Forderer  
(Admitted *Pro Hac Vice*)  
Cooley LLP  
3 Embarcadero Center  
San Francisco, CA 94111  
Telephone: 415.693.2128  
kforderer@cooley.com  
*Counsel for Plaintiffs*

/s/ Matthew D. Ridings per authority

Matthew D. Ridings, Trial Attorney  
(0079402)  
THOMPSON HINE LLP  
127 Public Square  
3900 Key Center  
Cleveland, Ohio 44114  
Telephone: 216.566.5561  
Facsimile: 216.566.5800  
Matt.Ridings@ThompsonHine.com

Jamar T. King (0091093)  
THOMPSON HINE LLP  
10050 Innovation Drive, Suite 400  
Miamisburg, OH 45342  
Telephone: 937.443.6852  
Facsimile: 937.443.6635  
Jamar.King@ThompsonHine.com

Karim Sabbidine  
(Admitted *Pro Hac Vice*)  
THOMPSON HINE LLP  
335 Madison Avenue, 12th Floor  
New York, NY 10017  
Telephone: 212.908.3944  
Facsimile: 212.344.6101  
Karim.Sabbidine@ThompsonHine.com

Joshua H. Epstein  
(Admitted *Pro Hac Vice*)  
Eva M. Jimenez  
(Admitted *Pro Hac Vice*)  
DAVIS+GILBERT LLP  
1675 Broadway  
New York, NY 1001  
Telephone: 212.468.4869  
jepstein@dglaw.com  
ejimenez@dglaw.com

*Attorneys for Specially Appearing  
Defendants William Campbell and Quantasy  
& Associates, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9<sup>th</sup> 2023, a true and accurate copy of the foregoing was filed electronically. Notice of this filing has been sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy was also sent by ordinary U.S. Mail, postage prepaid, to the following:

Paige McDaniel  
5576 Alexanders Lake Road  
Stockbridge, GA 30281

Brinson Caleb Silver  
2543 Walnut Avenue  
Venice Beach, CA 90291

/s/ William D. Kloss, Jr  
William D. Kloss, Jr.

*Counsel for Plaintiffs*